

**Convertino & Associates**

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COMMISSION

**The Mayflower Centre  
801 West Ann Arbor Trail, Suite 233  
Plymouth, Michigan 48170  
734-927-9900  
Facsimile 734-927-9904**

2011 OCT 11 PM 12:18

OFFICE OF GENERAL  
COUNSEL

**October 10, 2011**

**Via Facsimile/U.S. Mail**

**Erik Morrison, Paralegal**  
**Complaints Examination and**  
**Legal Administration**

***In re: P-MUR 524: Debra A. Doherty***

**Dear Mr. Morrison:**

On Friday, October 7, 2011, this firm was retained to represent Ms. Debra A. Doherty in the above referenced matter. Attached please find an executed "Statement of Designated Counsel" designating this firm as counsel.

Ms. Doherty has provided me with your letter dated September 16, 2011, wherein you indicated that the Federal Election Commission, Office of General Counsel has granted Ms. Doherty an extension of time to "respond to the complaint filed in the above-noted matter." Ms. Doherty currently has until October 12, 2011 to provide the Commission with her response!

I am not aware of any "complaint filed" against Ms. Doherty. If there is a complaint filed against Ms. Doherty *please forward it to me at your earliest opportunity*. If, however, no complaint has been filed and the Commission seeks a response to the allegations set forth in a letter dated August 25, 2011 by Jeff S. Jordan, Supervisory Attorney, Complaints Examination & Legal Administration Section, I have been unable to marshal and review the facts necessary to adequately respond to those allegations due to our very recent retention on this case.<sup>1</sup> Accordingly, I respectfully request an additional sixty days, that is, until December 12, 2011, to respond to the allegations set forth in Mr. Jordan's letter of September 16, 2011.

**Thank you in advance for your consideration in this matter.**

  
Richard G. Convertino

**Enclosure:**

<sup>1</sup> Mr. Jordan's letter of September 16, 2011 states, *inter alia*:

You have been identified for potentially making unauthorized disbursements in violation of the Act. While you acted as the treasurer for the Official 12th Dist Dem Party you may have made 6 unauthorized withdrawals of committee funds totaling \$14,500 over a period of 12 months (\$4,500 was refunded during that period leaving a net amount owed of \$10,000); hid your actions from the Official 12th Dist Dem Party and the Commission by failing to disclose the withdrawals on reports you prepared and submitted to the Commission; and you may have failed to file two post-election reports with the Commission.

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FEDERAL ELECTION COMMISSION OFFICE OF GENERAL  
999 E Street, NW  
Washington, DC 20463  
COUNSELStatement of Designation of Counsel  
(Respondent/Witness)MUR: 524Name of Counsel: RICHARD G. CONVERTINOFirm: CONVERTINO AND ASSOCIATES301 W. ANN ARBOR TRAIL, SUITE 233  
PLYMOUTH, MICHIGAN 48170Telephone: (734) 927 9900Fax: (734) 927 9904

The above named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/7/2011  
Date[Signature]  
SignatureName (Print): DEBRA A. O'HEARY

Address: \_\_\_\_\_

CLINTON TOWNSHIP, MICHIGAN 48036

Telephone: Home \_\_\_\_\_

Business ( ) \_\_\_\_\_

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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